

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
) CRIMINAL NO.: 04-10336-NMG
)
)
JULIO SANTIAGO, et al.)

UNITED STATES' LIST OF POTENTIAL WITNESSES

The United States of America, Michael J. Sullivan, United States Attorney for the District of Massachusetts, and William F. Bloomer, Assistant U.S. Attorney, hereby submits the following list of witnesses for trial in the above-referenced matter.

Government Witnesses

1. DEA Task Force Agent (TFA) Marco Chavez
 Lowell Police Department
2. Special Agent (SA) Michael O'Shaughnessy
 Drug Enforcement Administration (DEA)
3. Detective William John Samaras
 Lowell Police Department
4. SA Calice Couchman
 DEA
5. Lt. Terry G. Hanson
 Massachusetts State Police
6. SA Todd Prough
 DEA
7. TFA David Chartrand
 DEA
8. Detective Felix Figueroa
 Lowell Police Department
9. Detective Christopher Hanson
 Lowell Police Department
10. SA Greg Willoughby
 DEA

11. TFA Kevin Swift
Salem Police Department, NH
12. TFA Brian Proulx
Haverhill Police Department
13. SA Glenn Colletti
DEA
14. TFA Greg Hudson
Lowell Police Department
15. Detective James Faye
Lowell Police Department
16. Sgt. Stephen Walsh
Mass. State Police
17. SA Eric Kotchian
ATF
18. Chemist John E. Drugan
Mass. State Police Crime Lab
19. Richard Vasquez
ATF
20. Officer Peter Kelleher
Lowell Police Department
21. Detective Christopher Doolin
Lowell Police Department
22. Sgt. James Trudell
Lowell Police Department
23. SA James Connolly
DEA
24. Trooper John Jakobowski
Massachusetts State Police
25. Lt. Brian O'Hara
Massachusetts State Police (retired)
26. Michael Oppenheim
ATF

27. Trooper Jamie Cepero
Massachusetts State Police
28. Trooper Mark Capponett
Massachusetts State Police
29. Trooper David Crouse
Massachusetts State Police
30. Detective John K. Loney
NYPD
31. SA Norton Cordova
DEA
32. Della Saunders
Chemist, Department of Public Health
33. Michael Lawler
Chemist, Department of Public Health
34. Xiu Ying Gao
Chemist, Department of Public Health
35. Mai Ngoc Tran
Chemist, Department of Public Health
36. Detective Bryan McMahon
Lowell Police Department
37. Lawrence Giordano
Essex County Sheriff's Department
38. SA Dennis Barton
DEA
39. Detective Mark Rivet
Lawrence Police Department
40. Lt. Greg Dern
Massachusetts State Police
41. Detective Joseph Jakutis
Dracut Police Department
42. Sgt William Canty
Massachusetts State Police

- 43. Detective Linda Coughlin
Lowell Police Department
- 44. SA Kevin Frye
DEA
- 45. Trooper Robert S. MacAllister
Massachusetts State Police
- 46. Sergeant David Chartrand
Dracut Police Department
- 47. Trooper Joseph Masterson
Massachusetts State Police
- 48. Detective Jose Rivera
Lowell Police Department
- 49. Sgt. Barry Golner
Lowell Police Department
- 50. Officer David Ferry
Lowell Police Department
- 51. Detective Ann Lessieur
Lowell Police Department
- 52. Detective Daniel Ahern
Chelmsford Police Department
- 53. Lydia L. Gonzalez
Lowell Police Department
- 54. Sandra Lipchus
Chemist, Department of Public Health
- 55. Nancy Tisei
Chemist, Department of Public Health
- 56. Detective Kelly Richardson
Lowell Police Department

Civilian Witnesses

- 57. David Joly, Fitchburg, MA
- 58. James Mellor, Leominster, MA

- 59. Allen Ottens, Lowell, MA
- 60. Michael Noble, Lowell, MA

Keeper of the Records

- 61. AT&T Wireless
- 62. Nextel
- 63. Sprint PCS
- 64. T-Mobile
- 65. KeySpan
- 66. ComCast
- 67. MetroCall Wireless
- 68. New England Paging
- 69. Massachusetts Department of Public Health

The government reserves the right to amend or supplement the above witness list at any time prior to or during trial. By including the names of "potential" witnesses, the government makes no representation as to whether it will actually call any of the above-listed individuals as witnesses at trial. Should the defendant desire the attendance of any of the above witnesses at trial, she/he should serve them with appropriate process or contact the undersigned prosecutor to see if arrangements can be made for their production.

This list does not include witnesses that the United States may determine are necessary for rebuttal. The United States reserves its right to amend its witness list at any time before

the commencement of trial. The United States will notify counsel immediately if any such additions or amendments are made.

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ William F. Bloomer
WILLIAM F. BLOOMER
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I, William F. Bloomer, hereby certify that this document filed through the ECF system on September 22, 2006, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non registered participants this date via US Postal Service, postage prepaid.

/s/William F. Bloomer
WILLIAM F. BLOOMER

Date: 22 September 2006